

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:15CR00049 CDP/DDN
)	
SEDINA UNKIC HODZIC,)	
)	
Defendant.)	

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Comes now Defendant Sedina Hodzic, by and through her counsel Paul J. D'Agrosa and hereby requests this Court enter an order modifying the conditions of release, to allow Defendant to change her residence. In support thereof, Defendant states as follows:

1. The Order Setting Conditions of Release [doc. 158] was entered on May 5, 2015.
2. Defendant secured bail and is currently being supervised by the U.S. Pretrial Services Office.
3. Defendant is fully compliant with the conditions of release.
4. Defendant now seeks a modification of this Court's order, specifically Condition Number 6, which requires Defendant to reside with Ms. Hatic and her family on Fox Pointe Drive.
5. Defendant is requesting permission to move herself and her children to an apartment at 5010 Clayridge Drive, St. Louis, Missouri 63129, commonly known as the Oakbrook Gardens Apartments.

6. Ms. Hatic is willing to sign as a guarantor and has inspected the apartment complex. She has confirmed that Defendant's new residence is a short distance from the Hatic's home. This will allow Ms. Hatic to continue to supervise Defendant, to ensure that she appears as required and complies with all other conditions of release.

7. Defendant has consulted with Pretrial Services who have advised her to seek a court order to allow her to change her residence. Pretrial will be unable to inspect the new apartment until Defendant pays a deposit. Defendant intends to apply for the apartment but will not pay her deposit, until the Court rules on this motion.

8. Defendant has secured employment with the knowledge and consent of pretrial services.

WHEREFORE, for the foregoing reasons Defendant requests this Court enter an order modifying her conditions of release to allow her to change her residence.

Respectfully submitted,

LAW OFFICES OF
WOLFF & D'AGROSA

/s/Paul J. D'Agrosa
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2015, the foregoing was filed electronically with the Clerk of the Court and served via email upon the following: Mr. Matt Drake, Assistant U.S. Attorney.

/s/ Paul J. D'Agrosa